

Hon. Jed S. Rakoff
United States District Court
Southern District of New York
500 Pearl Street-Room 1340
New York, NY 10007.

September 20, 2022

Re: U.S. v. Dennis, 20 Cr. 623 (JSR)-Ex Parte Communication-Termination of Karloff Commissiong-Effective Immediately

Your Honor,

On September 19, 2022, I terminated Karloff Commissiong as standby counsel. When I confronted him about his communication with Xavier Donaldson he acknowledged they had spoken without my consent, suggesting there was no harm because they had not exchanged confidential information. He also advised me not to seek the witness testimony of Gloria García of the District Attorneys Office of the City of New York on the grounds she had nothing "relevant" to say, despite his knowing the (i) New York City District Attorney declined to indict me four months before my federal indictment, on the same facts and (ii) a state prosecutor's threshold for indictment is lower than the federal threshold to indict. Please see the Notice of Termination of Mr Commissiong below **(1)**

Please note also that, despite knowing subpoenas had been approved for service for key witnesses to establish my innocence, Mr. Commissiong sent me an "unsolicited" draft plea agreement. Both the Federal Defenders of New York and Anthony Cecutti had advised me to seek a plea agreement on this indictment while ignoring the exonerating evidence of the context of my communications and the lack of any evidence to support the indictment. Please find attached the Notice of Termination of the Federal Defenders of New York dated May, 31, 2022.

As trial is scheduled for [October 11, 2022](#), please provide three candidates immediately from which I may select new standby counsel. Please do not communicate further with Mr. Commissiong regarding my defense, and refrain throughout this process from advising the prosecutor's office regarding my issues with Mr Commissiong

Respectively Submitted

Willie Dennis
[646-509-6889](tel:646-509-6889)
woc2020@gmail.com

1 Notice of Termination of Karloff Commissiong-September 19, 2022

From: Willie Dennis <woc2020@gmail.com>

Date: 19 September 2022 at 9:56:01 AM GMT-4

To: "Karloff C. Commissiong" <karloff@amcmlaw.com>

Cc: Willie Dennis <woc2020@gmail.com>

Subject: Re: Re: U.S. (KL Gates) v. Dennis, 20 Cr. 623 (JSR)-Termination of Representation-Effective Immediately

Mr Commissiong,

Based on, among other things, your unauthorized communication with Xavier Donaldson, which led you to provide me with advice which is " grossly negligent and materially adverse to my defense **(1)** you are hereby terminated, effective immediately.

In taking this action, I intend to bring to the attention of Judge Rakoff, your complimentary e-mail **(2)** of the work and Counsel of (i) the Federal Defenders of New York, who despite representing me for over 7 months and even after a court date was set by Judge Lorna Schofield on April 4, 2022, among other

things (3) failed to issue any subpoenas to any of the 31 attorneys listed on the No Contact list, failed to make a speedy trial motion on my behalf and failed to respond to the Southern District's demand for discovery in January of 2022 and (ii) Anthony Cecutti who provided false testimony materially adverse to me in his first appearance before Judge Rakoff on August 15, 2022 (4)

Willie Dennis
woc2020@gmail.com
[646-509-6889](tel:646-509-6889)

1. Commissiong Unauthorized Communication with Xavier Donaldson on September 9, 2022

On 10 Sep 2022, at 6:53 AM, Willie Dennis <woc2020@gmail.com> wrote:

Mr.Commissiong,

I am representing myself in this matter.

You did not seek my approval to speak with Xavier Donaldson. I did not give Mr Donaldson my authorization to speak with you about my case

I am very disappointed that if your e-mail below is true you did so and I was not a participant on the calll and you are only 3 weeks into the case

Please provide me immedaitely with a wriiten statement as to what you believe Mr Donaldson shared with you

Also pleas provide to me immedatiely in writing your legal analysis as to why the testimony from the District attorney's office is not relevant.

Finally, again you are expressly forbidden from having any conversations on this matter with any parties without my consent.

Willie Dennis.

Sent from my iPad

On 9 Sep 2022, at 4:53 PM, Karloff C. Commissiong, Esq. <karloff@amcmlaw.com> wrote:

Regarding the subpoena of Ms. Garcia, I do not believe, after reading the January 2020 email and speaking with Xavier Donaldson, that Ms. Garcia has any relevant information to provide. I do not advise you to request a subpoena with respect to her.

Karloff

Karloff C. Commissiong, Esq.
Adams & Commissiong LLP
[65 Broadway Suite 1603](#)
[New York, NY 10006](#)

From: Willie Dennis <woc2020@gmail.com>

Sent: Friday, September 9, 2022 1:18:28 PM

To: Karloff C. Commissiong, Esq.
Cc: Karloff C. Commissiong, Esq.; Willie Dennis
Subject: Re: U.S. v. Dennis: Subpoenas

Mr Commissiong,

Any thoughts on my September 6 & 8, 2022 communications to you regarding the Court's question on relevance and legal forms of the subpoenas ?

Time is running out.

With respect to the District Attorney's office , you have stated you see no relevance

I want to make sure you understand the record and timeline

1 District Attorneys Office reviews KL Gates claims for harassment against me in June 2020 and declined to act upon them

2 District Attorney's office reviewed my claims against KL Gates in June 2020 and thought they were worthy of further investigation

3. KL Gates /DOJ files complaint against me approximately 4 months later October 2020 on similar charges to those in the District Attorney's

Based on these facts, do you continue to advise me there is no relevance in testimony related to my my defense ...possibly exculpatory information ?

As deadline is [5 pm today](#) , please respond as soon as possible.

2.September 4, 2022-Karloff Commissiong Complimenting the Counsel Provided by the Federal Defenders of New York and Anthony Cecutti

From: "Karloff C. Commissiong, Esq." <karloff@amcmlaw.com>

Date: 4 September 2022 at 2:38:51 PM GMT-4

To: Willie Dennis <woc2020@gmail.com>

Subject: Re: Witness Subpoenas-No Contact List Prepared by the Department of Justice, Dated December 1, 2021

Good Afternoon Mr. Dennis,

At this point, I cannot advise you as to what I would've done several months ago in connection with the issuance of subpoenas. Those lawyers, I presume, spoke with you and knew a bit more about this matter than I currently do. Lawyers for the Federal Defenders, as well as Mr. Cecutti, are all more than competent to have advised you with respect to that issue.

3. Termination of the Federal Defenders of New York-May 31 2022-

<Dear Mr Patton.pdf>

4. Anthony Cecutti's -False Testimony To The Court on August 15 2022

In the event that Mr Cecutti denies that he advised Mr. Dennis to plead guilty as discussed above, Mr Dennis refers the Court to the transcript of the hearing on August 14, 2022. In Mr Cecutti' s first

appearance before the Court on Mr. Dennis' behalf, Mr Cecutti testified that he had never advised Mr. Dennis to write to Judge Rakoff on August 12, 2022 to request an extension for a limine motions. (See transcript of hearing dated August 14, 2022. Mr Cecutti lied to the Court. Please see the e-mail below from Mr. Cecutti to Mr Dennis dated August 12, 2022 with Mr Cecutti advising Mr. Dennis to "write " to the Court to (i) request an extension and (ii) advise the Court of interference with Mr. Dennis electronic communications.

From: Anthony Cecutti <anthonycecutti@gmail.com>
Date: 12 August 2022 at 8:37:29 PM GMT-4
To: Willie Dennis <woc2020@gmail.com>
Cc: Kestine Thiele <kestine@iljlaw.com>
Subject: Re: Complaint

Willie,

Our legal advice is that we pursue a deferred prosecution on your behalf. We have advised this multiple times and you have rejected. Please let us know if your position has changed and if you now wish for us to pursue a deferred prosecution agreement.

As for your experience related to the interference of your electronic communications, we advise that you submit a letter to the court detailing your experience and attach your evidence, including the report from the technologist. We have advised this many times. You should be prepared to discuss this on Wednesday with Judge Rakoff.

Your motions in limine are due today. If you are seeking an extension, you should file a request today.

Anthony Cecutti, Esq. (he/him)
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